

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
HUNTINGTON DIVISION**

Jonathan R., minor by Next)	
Friend Sarah DIXON, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
v.)	Case No. 3:19-cv-00710
)	
Jim JUSTICE, in his official capacity as)	
the Governor of West Virginia, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

**DECLARATION OF RICHARD W. WALTERS IN SUPPORT OF PLAINTIFFS' REPLY
TO DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR SANCTIONS**

I, Richard W. Walters, declare:

1. I am counsel for Plaintiffs in the above-captioned action and submit this Declaration in support of Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion for Sanctions.
2. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of Plaintiffs' deposition of April Robertson taken on November 21, 2023.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 27, 2023.

/s/ Richard W. Walters
Richard W. Walters, WVSB #6809